

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</div> <div>Debtors.</div>	<div>PROMESA Title III</div> <div>No. 17 BK 3283-LTS</div> <div>(Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>No. 17 BK 3283-LTS</div>

MOTION TO COMPEL COMPLIANCE WITH PROPOSED STIPULATION

COMES NOW creditor Rafael Bonilla Rivera, through the undersigned legal counsel, and respectfully sets forth and prays:

1. In accordance with the applicable case management procedures, Movant sent a lift of stay notice on 25 July 2018 to counsel for Oversight Board and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) to advise them of Movant’s intent to seek relief from the Title III Stay at least fifteen (15) business days prior to filing a motion seeking such relief (the “Lift Stay Notice Period”) and (b) meet and confer with the Commonwealth during the Lift Stay Notice Period.

2. Movant sought the lift of stay of his case pending before the Commission for Appeals of Public Service, *Rafael Bonilla Rivera v. DTOP*, Case No. 2007-02-0829.

3. Afterwards, the Commonwealth and Movant met and conferred and reached an agreement stipulated in the document attached to this motion.

4. As per the terms of the Agreement, the Stipulation would be effective and enforceable immediately upon execution.

5. As of the date of this motion, the Commonwealth has failed to act upon the terms of the agreement and Movant's case before the administrative forum continues to be stayed.

WHEREFORE, Movant respectfully requests from the Honorable Court to notice the foregoing and enter an order allowing the lift of stay on Case No. 2007-02-0829 before the Commission for Appeals of Public Service.

CERTIFICATE OF SERVICE

I hereby certify that, on 5 October 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and parties in the Master Service List.

Miguel Ángel Serrano Urdaz, Esq.
USDC 223608
P.O. Box 1915
Guayama PR 00785
Tel/Fax 787-864-5454
Serrano.urdaz.law@hotmail.com

Attorney for Movant